U.S. Environmental Protection Agency Region III
Compliance Evaluation Inspection (CEI) Report

Name and Location of Facility Inspected		Entry Time/Date	Permit Effective Date
Potomac Electric Power Co. – Benning Generating Station 3400 Benning Road NE Washington, DC 20019		8:00 AM 9/11/2008	11/17/2000
NPDES Permit No: DC0000094		☒ **Major** ☐ **Minor**	**Permit Expiration Date** 11/17/2005
Name(s) of On-Site Representative(s), Title(s), Phone and Fax Number(s) Heather MacDonald (EHS Manager, NAES) Phone 202-388-2534 John Keiller (Sr Env Eng, PEPCO) Fax 202-388-2398 Ghirmay Berhe (Sr Env Eng, PHI)			**Notified of Inspection?** ☒ Yes ☐ No
Name of Responsible Official, Title, Phone and Fax Number Stephen Wisniewski (V.P. Operations) 701 Ninth Street NE Washington, DC 20068			**Contacted?** ☒ Yes ☐ No
Inspector(s) Lead: Dave Lyons (Tetra Tech, Inc) Backup: Adion Chinkuyu (DDOE), Ki on Cho (DDOE), Monir Chowdry (DDOE)			**Presented Credentials?** ☒ Yes ☐ No
Weather Conditions During the Inspection: sunny **Facility Receiving Water:** Anacostia River			

Overview of Areas Evaluated During the Inspection		
S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
Permit: M	Flow Measurement: U	Operations and Maintenance: S
Records and Reports: S	Self Monitoring Program: U	Solid Waste Handling and Disposal: N
Facility Site Review: S	Compliance Schedules: N	Pretreatment: N
Effluent and Receiving Waters: M	Laboratory: N	Stormwater: S

Prepared By:	Dave Lyons (Tt)	David M. Lyons 9/30/08
Reviewed By:	Robert Naeser (Tt)	Robert Naeser

Coded ICIS 3/25/09
and Compliance determin

Facility Narrative

On9/11/2008, a USEPA contractor inspected the Potomac Electric Power Co. – Benning Generating Station in Washington, DC 20068. Discharges from the facility are regulated by NPDES Permit No.DC0000094 (Permit). The primary purpose of the inspection was to determine the accuracy and reliability of the discharger's self-monitoring and reporting program. The primary on-site facility representative was Heather MacDonald (EHS Manager, NAES). The weather at the time of inspection was sunny.

The Benning Service Center (facility), which is referred to in the Permit as "Benning Generating Station" consists of an approximately 77 acre site which contribute stormwater and process water to the discharges authorized by the Permit. The facility consists of a generating station, a 230kV switchyard, a 69 kV switchyard, fleet services, transmission and distribution shops, transformer repair and testing shop, storage buildings and several parking areas. The generating station is comprised of two oil-fired steam generators each with a rated output of 275 MW. According to the facility representative, the generating station operates approximately 10 days/year as a peaking unit (normally during the summer cooling season). The generating station was not operating during the inspection. The generating station is owned by PEPCO but operated by North American Energy Services (NAES). The remainder of the facility is owned and operated by PEPCO.

The discharge from this facility is generated from cooling tower blowdown, oil/water separators and stormwater runoff (see Attachment 1, Water Balance Diagram). Stormwater runoff is conveyed through a drain system and is discharged to the Anacostia River and city storm sewers at various outfalls. The process wastewaters and the majority of the stormwater runoff are collected in a 54 inch sewer and discharged to the Anacostia River (Outfall 013) (photo 11). The following outfalls described in Table 1 are listed in the Permit, some are internal and some have monitoring requirements with discharge limits.

Table 1: Summary of Discharge Points			
Outfall	Description	Monitoring	Limits
001	Internal, stormwater		
002	Internal, cooling tower blowdown (closed)		
003[1]	Internal, oil/water separator	X	X
005	Internal, stormwater		
006	Internal, stormwater		
011	Internal, stormwater		
012	Internal, stormwater		
013[2]	Discharge to Anacostia River	X	X
014	Internal, stormwater		
015	Internal, stormwater		
016	Municipal sewer, stormwater		
201[3]	Internal, wastewater from oil/water separator, reverse osmosis regenerate, boiler blowdown	X	X
202[4]	Internal, cooling tower blow down	X	X
203[4]	Internal, cooling tower blow down	X	X
401	Municipal sewer, stormwater runoff from transformer storage area.	X	X
402	Internal, stormwater runoff from transformer shop area	X	X
416	Municipal sewer, stormwater runoff from transformer storage area.		

Notes:

1. Monitoring point 003 (photos 5 and 6) is the discharge point from a treatment system designed to remove oil, grease and solids from water removed from utility manholes and transported to the facility. The treatment system operates in batch mode and consists of an oil/water separator, settling tank (photo 2 and 3) followed by a two staged filter system of cloth and charcoal media (photo 4). The treatment system was operating and the effluent was visibly clear (photo 5).
2. Monitoring point 013 (photo 10) has two sets of monitoring requirements and effluent limits. These requirements vary depending on whether there is a discharge of discharge of cooling tower blow down.
3. Monitoring point 201 is the discharge point from an oil/water separator designed to remove oil, grease from utility wastewater. This unit is covered (photo 7) and could not be inspected; however, the effluent was visibly clear at the monitoring point (photo 8).
4. Monitoring points 202 and 203(photo 9) have two sets of monitoring requirements and effluent limits. These requirements vary depending on whether there is a discharge of cooling tower blow down or cooling tower washwater. There was no discharge during the inspection.

NAES staff conducts self-monitoring activities. Effluent samples for Outfall 013 are

collected at a manhole prior to the end of discharge pipe (photo 10). Samples for Outfalls 003 and 201 are collected at end of treatment system discharge pipe (photos 5 and 8). Samples for Outfalls 202 and 203 are collected from the cooling tower sumps. Locations appeared to comply with permit requirements, however, see Findings, Self Monitoring for a discussion of sampling methods. Laboratory analyses for reporting are performed by the PEPCO laboratory and one off-site contract laboratory (Microbac Laboratories, Inc, Baltimore, MD). Flow discharged through outfall 003 is measured by a flow meter on the discharge line (photo 6). (See Findings, Flow Measurement). Flows from 201 are estimated from pump rates and flows from 202 and 203 are estimated from valve characteristics according to facility representatives. The flow from 013 is estimated from the summation of the process outfalls and stormwater runoff calculated using rainfall data and runoff coefficients for the various sections of the facility. This approach appears to be consistent with Part A.

Discharge Monitoring Reports (DMRs) for the period of July 2007 – July 2008 were reviewed as a component of this inspection. The review included a comparison of reported monitoring results versus requirements and limitations contained within the permit. Permit limit exceedances were identified and are presented in the Findings component of this report. DMRs were reviewed for completeness and accuracy, no discrepancies were identified.

Permit Part C, Storm Water Management requires the facility to develop and implement a SWPPP. This document was reviewed as part of this inspection. The most recent SWPPP revision was dated 1/15/2008, and was signed by the responsible corporate official. Specific elements reviewed included monthly inspection reports, annual comprehensive site evaluations, employee training records and site plan. Deficiencies in the monthly inspection reports were identified and are presented in the Findings component of this report. The table of contents was reviewed to against the required elements of Permit Part C. 7. Based on this review the SWPPP content and implementation are rated satisfactory. The facility has an SPCC plan, which is signed by a responsible official; however, its contents were not reviewed for adequacy.

Findings

Permit (M)

1. There were no records on file of the facility informing the EPA Region of facility changes including elimination of the ash pit, and hydrostatic test water and the closing of Outfalls 002 and 010.
2. The Permit is administratively extended by a letter dated 9/26/2005 based on PEPCO's timely re-application dated 5/16/2005.

Records and Reports (S)

Monitoring Records are not kept onsite. Instead they are kept in files at PEPCO corporate offices. All requested documents were made available during the inspection.

Facility Site Review (S)

1. All treatment units and supporting equipment were in service and mechanically functioning properly.

2. Housekeeping procedures are adequate and BMPs were in place to prevent release of pollutants to environment.
   a. Adequate dikes and secondary containment (photo 17)
   b. Spill containment and clean-up (photo 16)
   c. Signs of spillage to soil, groundwater, or surface water
   d. Leaking pipes, pumps, etc.
   e. Drum and chemical storage areas (photos 12 and 13)
   f. Minimization of pollutants entering storm water outfalls (photo 18)

One isolated discrepancy was yard debris in Building 75 loading dock area. (photo 14)

Effluent and Receiving Waters (M)

Exceeded Effluent Limits (Permit Provision Part A)

On 6/10/2008, an effluent exceedance was recorded for Outfall 202:
1. Zinc daily maximum - reported 2.5 mg/l (limit 1 mg/l) which also caused
2. Zinc Monthly average - reported 1.8 mg/l (limit 1 mg/l).

On 6/9/2008, an effluent exceedance was recorded for Outfall 203:
1. Zinc daily maximum - reported 1.6 mg/l (limit 1 mg/l) which also caused
2. Zinc Monthly average - reported 1.5 mg/l (limit 1 mg/l).

Flow Measurement (S)

The outfall 003 flow meter has not been calibrated since it was installed, according to the facility representative. Part F.2 requires that flow measurement devices be calibrated to ensure that the accuracy of the measurements is consistent with the accepted capability of that type of device. On 9/19/2008 the facility provided information from the manufacturer that claims that the meter does not require periodic calibration after initial installation.

Self-Monitoring Program (U)

1. Samples for oil and grease are not using approved protocols. The facility representative indicated that a bucket is used to collect the sample and then the sample is poured into glass bottles for shipment to the laboratory for analysis. This procedure does not conform to 40 CFR 136 (EPA Method 413.1) which requires oil and grease samples to be collected directly from the discharge into a glass bottle.
2. Grab samples for pH and residual chlorine are not measured insitu or within 15 minutes of sample collection as required by 40 CFR 136, instead samples are transported to the laboratory for analysis. A review of the pH sampling and analysis log indicates that 15 minutes is often missed (Attachment 2)

3. Chain of Custody forms for Outfall 013 samples dated 9/13/2007 and 6/19/2008 did not have sample temperature recorded to verify the sample was preserved in accordance with 40 CFR 136.

Part F.3.a requires monitoring be conducted according to procedures approved under 40 CFR 136.

Compliance Schedules (N)
Not applicable

Operations and Maintenance (S)
Issues with operation and maintenance of the process wastewater treatment facilities were not identified.

Solid Waste Handling and Disposal (N)
Not applicable

Pretreatment (N)
Not applicable

Stormwater (S)
Monthly inspections are conducted by NAES staff for the generating station and PEPCO staff for the remainder of the facility site. Each complete separate reports. PEPCO reports are in the form of a checklist and is signed by the inspector and reviewed and initialed by a manager. The NAES reports are in memo form and contain no signature. The PEPCO reports appear to meet the intent of EPA's Multisector General Stormwater Permit and the NAES does not.

Attachments: Photo Log, Water Balance Diagram (Attachment 2),
pH Monitoring Log (Attachment 3)

Photo 1: Facility sign

Photo 2: Treatment units at monitoring point 003.
Oil/water separator (A), Settling tank (B)

Photo 3: Skimmer – oil/water separator 003

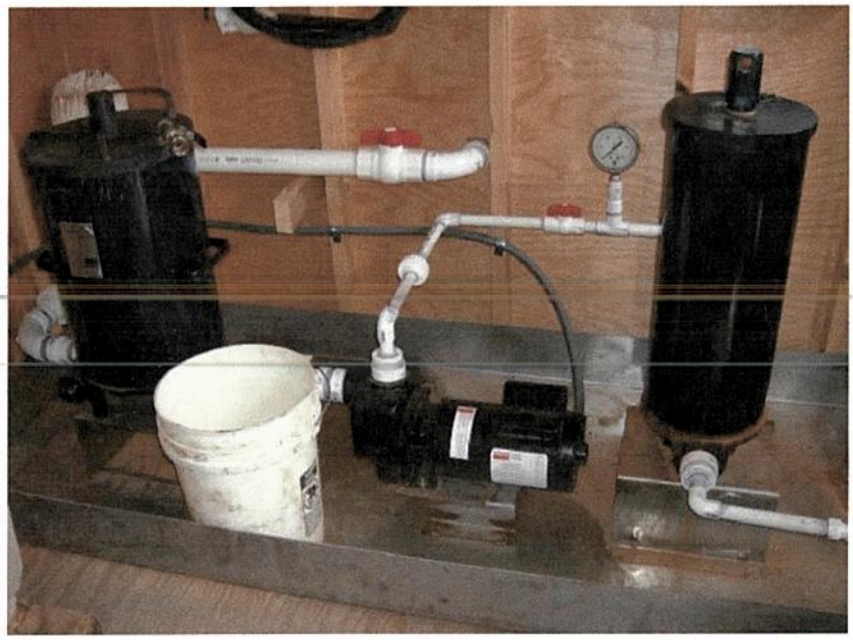


Photo 4: Filter system 003 – cloth filter (left), charcoal filter (right)

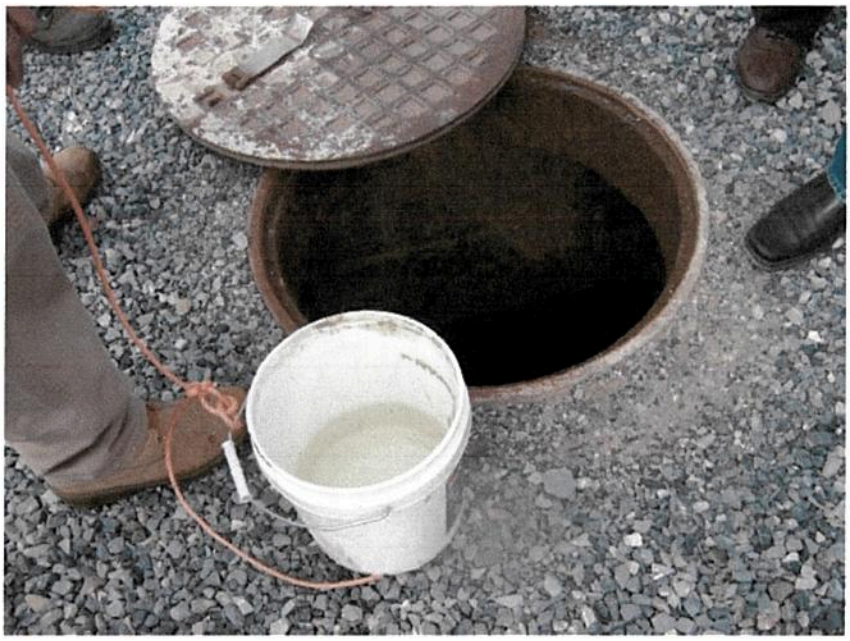


Photo 5: Sampling point 003 – note effluent in bucket

Photo 6: Flow meter 003

Photo 7: Oil/water separator at monitoring point 201

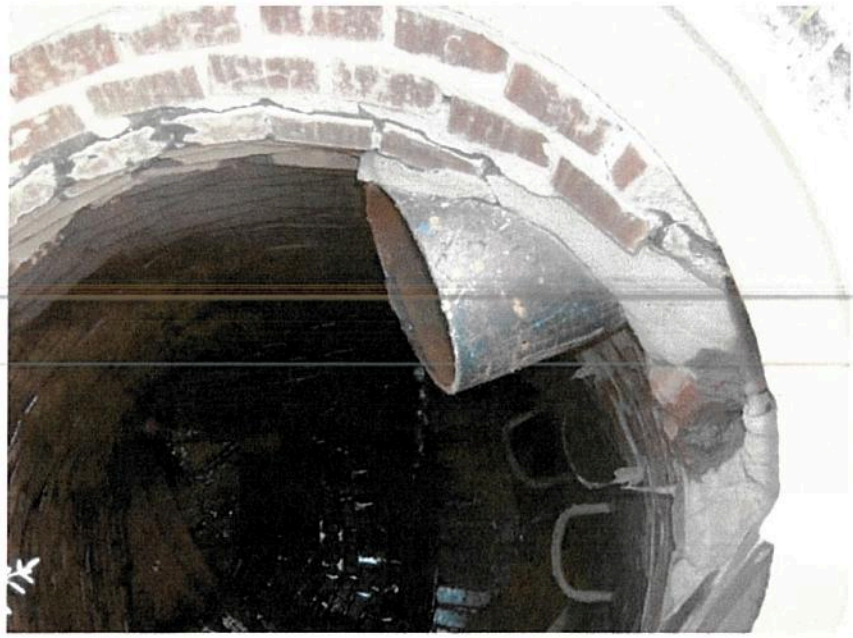


Photo 8: Sampling point 201

Photo 9: Sampling point 203 at cooling tower unit 16

Photo 10: Sampling point 013

Photo 11: Outfall 013 at the Anacostia River

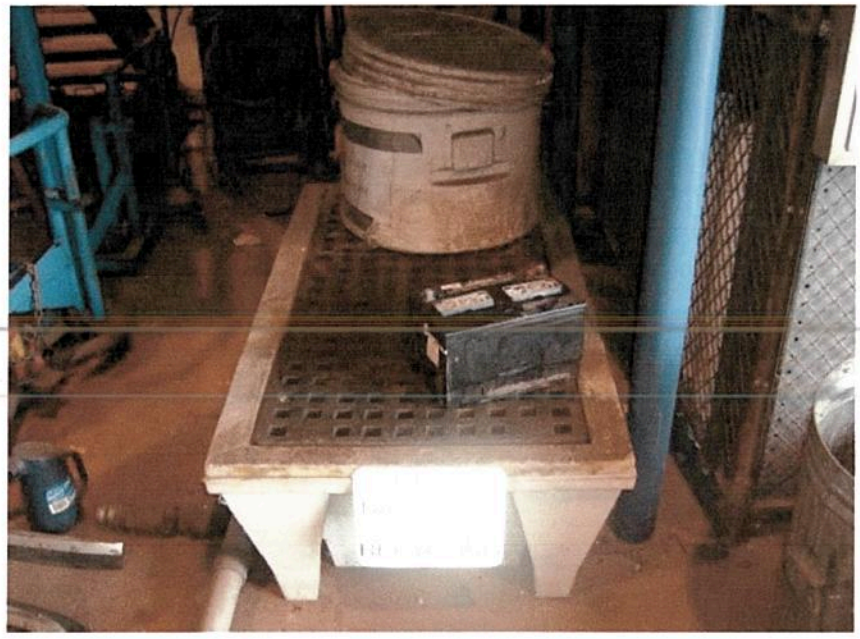


Photo 12: Containment BMP in repair facility (Bldg 75)

Photo 13: Waste oil collection BMP in repair facility (Bldg 75)

Photo 14: Yard debris - repair facility (Bldg 75)

Photo 15: Vehicle wash station

16: Vehicle Fueling Station – Drain in the foreground discharges to containment

Photo 17: Containment – fuel storage tank

Photo 18: Yard drain BMP

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	2 5 · 3 DC0000490 9 4 11	12 17	18 C	19 G	20 2

Remarks

21 POTOMAC ELEVATED PIGMER 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 69	70 2	71	72	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

POTOMAC ELECTRIC POWER CO - BENNING GEN. STA
3400 BENNING RD, NE
WASHINGTON, DC 20019

Entry Time/Date	Permit Effective Date
8:00A 9/4/08	11/17/2000
Exit Time/Date	**Permit Expiration Date**
3:30P 9/11/08	11/17/2005

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

HEATHER MACDONALD, EHS MANAGER - NAES
JOHN KELLER, SR. ENVIRON. ENGINEER - PEPCO
GHIRMAY BERHE, SR. ENVIRON. ENGINEER - PHI

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*

Name, Address of Responsible Official/Title/Phone and Fax Number — **Contacted** ☒ Yes ☐ No

STEPHEN WISNIEWSKI, V.P. OPERATIONS
701 NINTH ST., NE
WASHINGTON, DC 20068

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☒ Permit	☒ Self-Monitoring Program	☐ Pretreatment	☐ MS4
☒ Records/Reports	☐ Compliance Schedules	☐ Pollution Prevention	
☒ Facility Site Review	☐ Laboratory	☒ Storm Water	
☒ Effluent/Receiving Waters	☒ Operations & Maintenance	☐ Combined Sewer Overflow	
☒ Flow Measurement	☐ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
☐☐☐☐☐	
☐☐☐☐☐	
☐☐☐☐☐	
☐☐☐☐☐	

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
DAVID N. LYONS, P.E.	TETRA TECH, INC (703) 385-1088	9/11/2008
David N. Lyons		
Signature of Management Q A Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

- A Performance Audit
- B Compliance Biomonitoring
- C Compliance Evaluation (non-sampling)
- D Diagnostic
- F Pretreatment (Follow-up)
- G Pretreatment (Audit)
- I Industrial User (IU) Inspection
- J Complaints
- M Multimedia
- N Spill
- O Compliance Evaluation (Oversight)
- P Pretreatment Compliance Inspection
- R Reconnaissance
- S Compliance Sampling
- U IU Inspection with Pretreatment Audit
- X Toxics Inspection
- Z Sludge - Biosolids
- # Combined Sewer Overflow-Sampling
- $ Combined Sewer Overflow-Non-Sampling
- + Sanitary Sewer Overflow-Sampling
- & Sanitary Sewer Overflow-Non-Sampling
- \ CAFO-Sampling
- = CAFO-Non-Sampling
- 2 IU Sampling Inspection
- 3 IU Non-Sampling Inspection
- 4 IU Toxics Inspection
- 5 IU Sampling Inspection with Pretreatment
- 6 IU Non-Sampling Inspection with Pretreatment
- 7 IU Toxics with Pretreatment
- ! Pretreatment Compliance (Oversight)
- @ Follow-up (enforcement)
- (Storm Water-Construction-Sampling
-) Storm Water-Construction-Non-Sampling
- : Storm Water-Non-Construction-Sampling
- ~ Storm Water-Non-Construction-Non-Sampling
- < Storm Water-MS4-Sampling
- - Storm Water-MS4-Non-Sampling
- > Storm Water-MS4-Audit

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the Inspection.

- A — State (Contractor)
- B — EPA (Contractor)
- E — Corps of Engineers
- J — Joint EPA/State Inspectors—EPA Lead
- L — Local Health Department (State)
- N — NEIC Inspectors
- O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
- P — Other Inspectors, State (Specify in Remarks columns)
- R — EPA Regional Inspector
- S — State Inspector
- T — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 — Industrial. Other than municipal, agricultural, and Federal facilities.
3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
4 — Federal. Facilities identified as Federal by the EPA Regional Office.
5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

Comments:

	PERMIT NO. DC0000094
SECTION I – OPERATION AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. DETAILS:	X YES _ NO _ N/A (Further explanation attached _____)
(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED.	_ YES _ NO X N/A
(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	X YES _ NO _ N/A
(c) REPORTS ON ALTERNATE SOURCE OF POWER SENT TO EPA/STATE AS REQUIRED BY PERMIT.	_ YES _ NO X N/A
(d) SLUDGES AND SOLIDS ADEQUATELY DISPOSED. OIL/WATER SEPARATOR	X YES _ NO _ N/A
(e) ALL TREATMENT UNITS IN SERVICE.	_ YES _ NO _ N/A
(f) CONSULTING ENGINEER RETAINED OR AVAILABLE FOR CONSULTATION ON OPERATION AND MAINTENANCE PROBLEMS.	_ YES _ NO X N/A
(g) QUALIFIED OPERATING STAFF PROVIDED.	X YES _ NO _ N/A
(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS.	_ YES _ NO X N/A
(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS.	X YES _ NO _ N/A
(j) INSTRUCTIONS FILES KEPT FOR OPERATION AND MAINTENANCE OF EACH ITEM OF MAJOR EQUIPMENT.	_ YES _ NO X N/A
(k) OPERATION AND MAINTENANCE MANUAL MAINTAINED.	_ YES _ NO X N/A
(l) SPCC PLAN AVAILABLE.	X YES _ NO _ N/A
(m) REGULATORY AGENCY NOTIFIED OF BY-PASSING. (Dates _____ _____)	_ YES _ NO X N/A
(n) ANY BY-PASSING SINCE LAST INSPECTION.	_ YES X NO _ N/A
(o) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED.	_ YES X NO _ N/A
SECTION J – COMPLIANCE SCHEDULES	
PERMITTEE IS MEETING COMPLIANCE SCHEDULE.	_ YES _ NO X N/A (Further explanation attached _____)
CHECK APPROPRIATE PHASE(S):	
_ (a) THE PERMITTEE HAS OBTAINED THE NECESSARY APPROVALS FROM THE APPROPRIATE AUTHORITIES TO BEGIN CONSTRUCTION.	
_ (b) PROPER ARRANGEMENT HAS BEEN MADE FOR FINANCING (mortgage commitments, grants, etc.).	
_ (c) CONTRACTS FOR ENGINEERING SERVICES HAVE BEEN EXECUTED.	
_ (d) DESIGN PLANS AND SPECIFICATIONS HAVE BEEN COMPLETED.	
_ (e) CONSTRUCTION HAS COMMENCED.	
_ (f) CONSTRUCTION AND/OR EQUIPMENT ACQUISITION IS ON SCHEDULE.	
_ (g) CONSTRUCTION HAS BEEN COMPLETED.	
_ (h) START-UP HAS COMMENCED.	
_ (i) THE PERMITTEE HAS REQUESTED AN EXTENSION OF TIME.	

Comments:

PERMIT NO. DC0000094

SECTION K – SELF-MONITORING PROGRAM

PART 1 – FLOW MEASUREMENT (Further explanation attached EST EXCEPT 003(METER) PERMITTEE FLOW MEASUREMENT MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT. DETAILS:	X YES _ NO _ N/A
(a) PRIMARY MEASURING DEVICE PROPERLY INSTALLED.	_ YES _ NO _ N/A
TYPE OF DEVICE _ WEIR _ PARSHALL FLUME X MAGMETER _ VENTURI METER _ OTHER (Specify _____)	
(b) CALIBRATION FREQUENCY ADEQUATE. (Date of last calibration _____)	_ YES X NO _ N/A
(c) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED.	X YES _ NO _ N/A
(d) SECONDARY INSTRUMENTS (totalizers, recorders, etc.) PROPERLY OPERATED AND MAINTAINED.	_ YES _ NO X N/A
(e) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOW RATES.	X YES _ NO _ N/A
PART 2 – SAMPLING (Further explanation attached _____) PERMITTEE SAMPLING MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT. DETAILS:	_ YES X NO _ N/A
(a) LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES. 013 TOO DEEP	YES X NO _ N/A
(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT.	X YES _ NO _ N/A
(c) PERMITTEE IS USING METHOD OF SAMPLE COLLECTION REQUIRED BY PERMIT. IF NO, _ GRAB _ MANUAL COMPOSITE _ AUTOMATIC COMPOSITE _ FREQUENCY _____	X YES _ NO _ N/A
(d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE.	_ YES X NO _ N/A
(i) SAMPLES REFRIGERATED DURING COMPOSITING	_ YES _ NO X N/A
(ii) PROPER PRESERVATION TECHNIQUES USED	X YES _ NO _ N/A
(iii) FLOW PROPORTIONED SAMPLES OBTAINED WHERE REQUIRED BY PERMIT	_ YES _ NO X N/A
(iv) SAMPLE HOLDING TIMES PRIOR TO ANALYSES IN CONFORMANCE WITH 40 CFR 136.3 PH, TRC	_ YES X NO _ N/A
(e) MONITORING AND ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT.	_ YES X NO _ N/A
(f) IF (e) IS YES, RESULTS ARE REPORTED IN PERMITTEE'S SELF-MONITORING REPORT.	_ YES _ NO _ N/A
PART 3 – LABORATORY (Further explanation attached _____) PERMITTEE LABORATORY PROCEDURES MEET THE REQUIREMENTS AND INTENT OF THE PERMIT. DETAILS:	X YES _ NO _ N/A
(a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED. (40 CFR 136.3)	X YES _ NO _ N/A
(b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED.	_ YES _ NO _ N/A
(c) PARAMETERS OTHER THAN THOSE REQUIRED BY THE PERMIT ARE ANALYZED.	_ YES X NO _ N/A
(d) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.	_ YES _ NO X N/A NOT REVIEWED
(e) QUALITY CONTROL PROCEDURES USED.	X YES _ NO _ N/A

(f) DUPLICATE SAMPLES ARE ANALYZED _____ % OF TIME. NOT REVIEWED	_ YES	_ NO	_ N/A
(g) SPIKED SAMPLES ARE USED _____ % OF TIME. NOT REVIEWED	_ YES	_ NO	_ N/A
(h) COMMERCIAL LABORATORY USED.	X YES	_ NO	_ N/A
(i) COMMERCIAL LABORATORY STATE CERTIFIED.	_ YES	_ NO	X N/A

LAB NAME _____

LAB ADDRESS _____

Comments:

PERMIT NO.

SECTION L – EFFLUENT/RECEIVING WATER OBSERVATIONS (Further explanation attached _____)

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOLIDS	COLOR	OTHER

(Sections M and N: Complete as appropriate for sampling inspections)

SECTION M – SAMPLING INSPECTION PROCEDURES AND OBSERVATIONS (Further explanation attached _____)

_ GRAB SAMPLES OBTAINED

_ COMPOSITE OBTAINED

_ FLOW PROPORTIONED SAMPLE

_ AUTOMATIC SAMPLER USED

_ SAMPLE SPLIT WITH PERMITTEE

_ CHAIN OF CUSTODY EMPLOYED

_ SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE

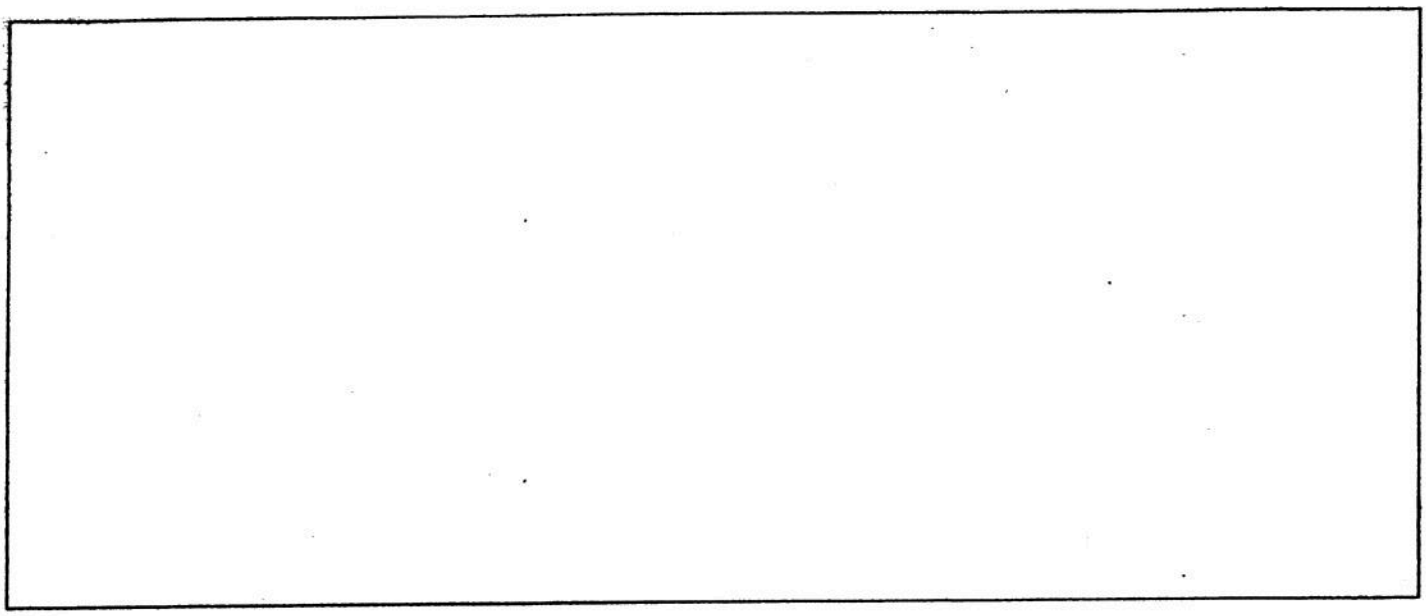
COMPOSITING FREQUENCY _____ PRESERVATION _____

SAMPLE REFRIGERATED DURING COMPOSITING: _ YES _ NO

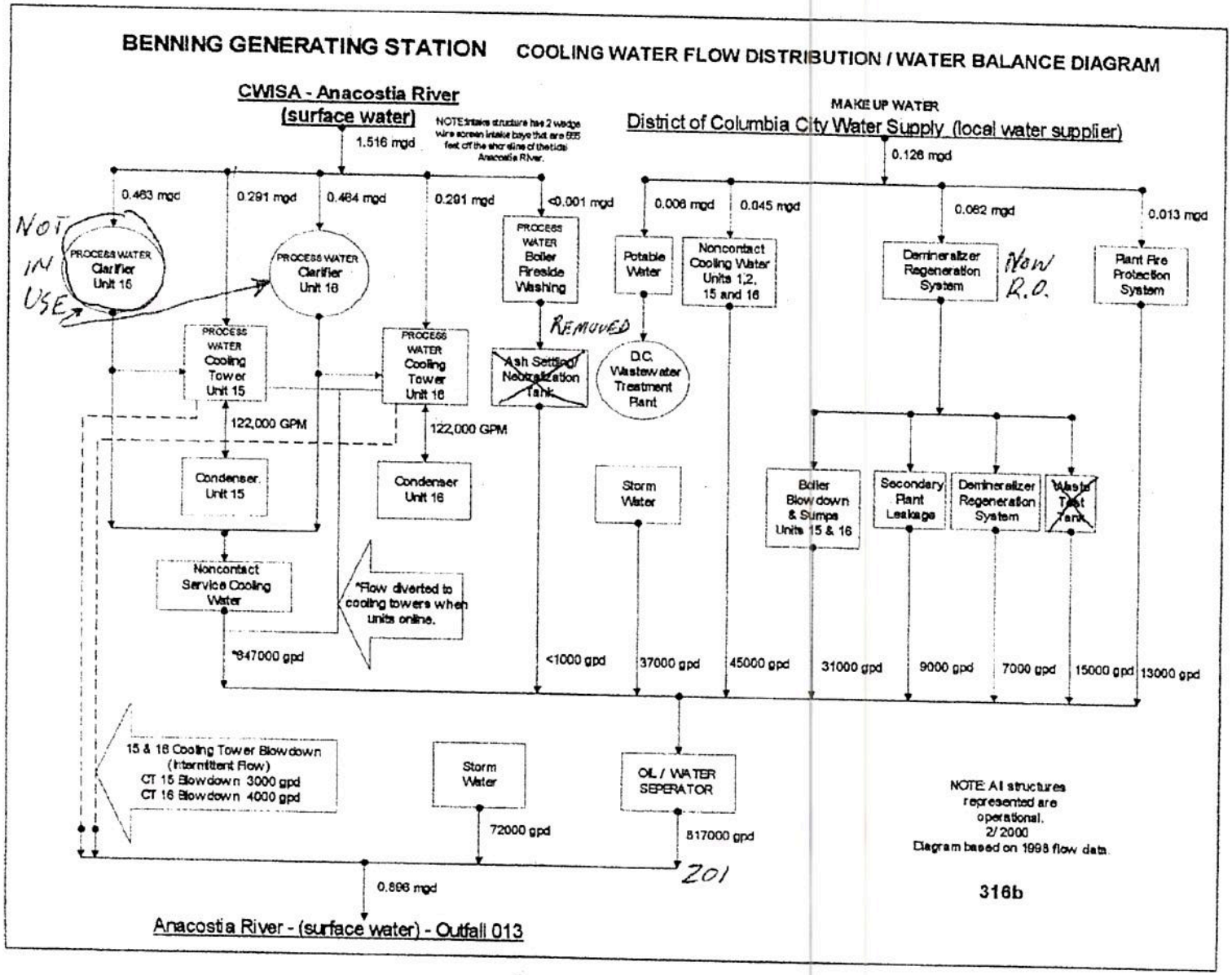
SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE _____

_____

SECTION N – ANALYTICAL RESULTS (Attach report if necessary)



Attachment 1 - Water Balance Diagram



NPDES - MP201 Discharge to 54" Storm Sewer

Attachment 2 - pH log

DATE	TIME	TECH	pH #1 @ °C	pH #2 @ °C	Time sampled
12/6/06	12:20	HLM	7.37 @ 11.7°C	7.50 @ 11.4°C	Sampled @ 12:15
1/12/07	13:53	HLM	7.01 @ 14.2°C	7.04 @ 13.4°C	Sampled @ 13:2
2/15/07	12:30	HLM	7.80 @ 8.9°C	7.8[illegible] @ 8.4°C	Sampled @ 12:2
3/21/07	10:35	HLM	6.54 @ 11.2°C	6.64 @ 11.6°C	Sampled @ 10:15
4/19/07	10:42	HLM	6.53 @ 13.9°C	6.59 @ 13.9°C	Sampled @ 10:3
5/14/07	14:30	HLM	7.39 @ 18.8	7.64 @ 18.6	Sampled @ 14:05
6/21/07	13:50	HLM	8.04 @ 22.9°C	8.06 @ 23°C	Sampled @ 13:15
7/11/07	10:40	HLM	7.14 @ 25.3°C	7.14 @ 25.8°C	Sampled @ 10:2
8/6/07	17:00	HLM	7.68 @ 24.9°C	7.68 @ 25.0°C	Sampled @ 16:3
9/12/07	15:47	HLM	7.58 @ 24.8°C	7.65 @ 25.0°C	Sampled @ 15:25
10/9/07	10:00	HLM	8.26 @ 26.5°C	8.21 @ 26.7°C	Sampled @ 09:5
11/9/07	08:15	HLM	7.07 @ 15.7°C	7.12 @ 15.7°C	Sampled @ 08:0
12/19/07	10:15	HLM	7.11 @ 11.7°C	7.18 @ 11.4°C	Sampled @ 10:0
1/10/08	09:58	HLM	7.08 @ 11.2°C	7.16 @ 11.1°C	Sampled @ 09:4
2/25/08	10:20	HLM	7.47 @ 12.2°C	7.74 @ 12.1°C	Sampled @ 10:1
3/19/08	11:15	HLM	7.03 @ 13.9°C	7.15 @ 13.7°C	Sampled @ 11:0
4/7/08	0903	mp	7.17 @ 12.9°C	7.22 @ 12.9°C	Sampled @ 0838
5/8/08	1005	mp	7.42 @ 19.6°C	7.44 @ 18.4°C	Sampled @ 0945
6/9/08	21:50	HLM	7.55 @ 26.5°C	7.87 @ 26.7°C	Sampled @ 21:2
6/19/08	1341	mp	6.57 @ 26.9°C	6.61 @ 27.1°C	Sampled @ 1332
7/14/08	0820	mp	7.53 @ 22.8°C	7.52 @ 22.8°C	Sampled @ 0800
8/7/08	1605	mp	7.53 @ 23.8°C	7.62 @ 23.7°C	Sampled @ 1550